Bulkley Timber Supply Area
Timber Supply Review

Summary of Public Input

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This is a summary of the public input received on the Timber Supply Review in the Bulkley Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.

106-04987/

Bulkley Timber Supply Area

Background

As part of the review of timber supply in the Bulkley Timber Supply Area (TSA), two opportunities were provided for public input. The first followed release of the Bulkley Timber Supply Area *Data Package* and *Information Report* in June 1998. The *Information Report* was a non-technical summary of the draft data and management assumptions that were to be applied in reviewing the timber supply for the Bulkley TSA. A 30-day review period, ending July 3, 1998, was provided for the public to comment on these documents.

On April 19, 2001, the British Columbia Forest Service released the *2001 Bulkley Timber Supply Area Analysis Report* and *Public Discussion Paper*. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information during the 45-day review period that ended June 4, 2001.

This report summarizes the input received during both public review periods. This information was provided to the chief forester for his consideration when he reviewed the AAC for the Bulkley TSA. The first section of this summary outlines the public review process implemented by the Forest Service, and describes the types of public input received. The second section summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Protection of Privacy Act*) can be reviewed at the Bulkley/Cassiar Forest District office.

Public Review Process and Response

Bulkley District staff actively solicited public input on the Timber Supply Review in the Bulkley TSA through the following actions:

- approximately 220 copies of the *Information Report* and of a letter advising of the availability of the *Analysis Report* were mailed to stakeholders in the TSA, including First Nations, licensees, local governments and environmental groups. Meetings or presentations were offered.
- the *Data Package* and *Analysis Report* were available at both the district office and the regional office in Smithers. About 30 copies of the *Data Package* and eight copies of the *Analysis Report* were picked up. Approximately ten copies of each were mailed out.
- newspaper advertisements were placed, advising of the availability of all documents for review by the public.
- copies of all the documents were made available to the local media. Interviews were conducted with the local radio and newspaper.
- on June 22, 1998, an open house was conducted at the Bulkley Forest District office in Smithers. Five people attended.
- presentations to the Bulkley Silviculture Committee were made on November 6, 1997, and April 25, 2001. Sixteen people were in attendance on each occasion.
- referrals were made to the Ministry of Forests website where documents were available to download.

The Bulkley Forest District received six written submissions on the *Data Package* and four submissions on the *Analysis Report* (see Appendix 1).

Public Input

In this section, public input on the information presented in the Timber Supply Review documents for the Bulkley TSA is summarized under the following headings:

- Data Package (and Information Report)
- Timber Supply Area Analysis Report
- Other comments

Data Package

Land Base Factors

The submission from Pacific Inland Resources (PIR) questions whether the private land portion of woodlots contributes to the operable land base in the analysis.

On the issue of defining the operable land base, staff from the (former) Ministry of Environment, Lands and Parks (MELP) said it's a flawed assumption that second-growth stands that develop after harvesting marginally economic forest types will yield merchantable volumes in the future, unless one is prepared to wait a very long time. The agency pointed to MacMillan Bloedel's announcement that their second-growth stands on slopes over 60 percent are not economic to harvest, and asks what analysis has been done to support the ministry's assumption that all marginal sites will yield merchantable volumes.

Two submissions express the hope that it has finally been accepted that all trees have value and no longer will deciduous species will be cut and left in piles to rot.

MELP said they cannot support the assumption that areas with agricultural potential will be harvested in their entirety within 60 years. This is not consistent with the Bulkley Land and Resource Management Plan (LRMP), according to MELP, and wildlife habitat considerations will result in some of this land not being converted to agricultural crop production. The agency says a more objective assumption would be a 50:50 split.

Environmentally Sensitive Areas (ESAs)

Two submissions say that ESAs should contribute to requirements for riparian habitat and biodiversity.

PIR notes additional areas that have terrain stability mapping which could be used in place of ESAs for sensitive soils.

On the topic of potentially unstable areas, MELP said maintaining root-wad holding capacity, associated with mature trees, will be important for these sites, as will maintaining site hydrology. MELP said partial cutting and extended rotations will likely need to be factored into the analysis for these sites.

Roads, Trails & Landings (RTLs)

Two submissions ask if the 6.1 percent reduction for future RTLs has been checked against actual field measurements of built roads.

PIR asks to review the data and procedure used to determine the reductions for RTLs and makes a number of comments on this topic:

- the average width of roads and trails appears excessive given the reduction of landing use and the utilization of hoes to build roads.
- roads inside blocks are planted to the road prism and trails are usually planted.
- PIR has rehabilitated 82 hectares of landings, which would reduce existing RTLs by two percent.
- future RTLs should be 4.5 to five percent of the remaining operable land base, not the total operable.
- a field survey may be required to determine RTL numbers.

Expected Rate of Growth

PIR questions the source of data for site indices used to define analysis units and says the results of the Bulkley district's OASIS (Operational Adjustment to Site Index Study) pilot project should be incorporated. The company questions the statement that similar growth is expected in both the Interior zone and Coastal transition zones, saying their experience shows a higher rate of growth in the latter.

PIR says the minimum harvestable age (MHA) for each analysis unit should not be restrictive and MHAs should be examined as a function of site index and density management in the sensitivity analysis, and possibly replaced by minimum diameter and volume criteria.

Regeneration and Silviculture

PIR says the regeneration assumptions (Table 15) should describe the initial density regime as total countable conifer stems per hectare. The company also says the negative-ten-year regeneration delay assigned to areas of natural subalpine fir advanced regeneration may be doubled to 20 years (reference cited).

PIR says the plan to space all the over-dense stands aged one to 20 years should be reviewed. The company says a priority list is required to determine the most effective treatment schedule, as some sites are not feasible to treat. PIR says the Bulkley Silviculture Strategy will provide direction.

Green-Up Requirements

PIR says that in operational terms green-up is more flexible than simply a three-metre requirement, and suggests a wording change to the *Data Package*.

Visual Quality Management

Two submissions point out that visual management does not mean hiding harvesting activities, but ensuring that those that occur in sensitive areas are not jarring to the eye.

Riparian Management

PIR says, based on their experience, there are significantly more S4 streams than S3 streams so the weighted average for reserve and management zone widths should be very close to S4 management requirements.

MELP said the riparian management zone reductions should be based on the *Biodiversity Handbook*, not current practices. The agency says professional discretion may result in smaller riparian reductions at times, but a consistent downward deviation would raise a riparian habitat protection question.

Biodiversity

PIR questions the significant increase in the amount of harvestable land tied up in Wildlife Tree Patches (WTPs) in the *Data Package* compared to the draft presented earlier and asks how the new numbers were derived. The company says in the Interior Cedar-Hemlock and Sub-Boreal Spruce zones, 75 percent of WTP requirements should be met outside the timber harvesting land base, as demonstrated by current practice.

A submission from MELP suggested a sensitivity analysis to examine the impact of meeting old-seral targets in low emphasis units immediately, rather than over three rotations.

PIR makes several technical points on the data and assumptions relating to landscape level biodiversity.

Unsalvaged Losses

PIR says the estimate of unsalvaged losses should be revised, given that some wood (dry sawlog and dry pulpwood) that is currently utilized and included in their cut control is not included in the forest inventory and may be counted as unsalvaged loss. The company provides harvest history figures to support their position.

MELP said the statement in the *Data Package* that "the western balsam bark beetle is recognized as the most serious threat to mature balsam stands" has no ecological validity. By attacking individual old trees, MELP said these insects play an important role in maintaining forest health and stand perpetuation through gap-opening successional processes.

Special Management Zones

A second submission from MELP said that since Special Management Zones are an approved management zone in the Bulkley LRMP, they should be part of the base case and not just be examined in a sensitivity analysis.

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Socio-Economic Factors

Two submissions say the analysis must consider the long-term negative effects on tourism and recreation-based employment of maintaining or increasing the harvest rate. They also say using employment figures per 1000 cubic metres may not be a very reliable guide to estimating future employment, and suggest that extrapolating from the historical downward trend in employment might be more reliable.

Two submissions note that wages in the resource sector are higher than the provincial average wage and thereby provide a greater social benefit through higher taxes paid and more disposable income (generating a greater multiplier effect). They say limited job losses could be expected from an AAC reduction, but the average annual wage will go down due to a reduction in the harvest season, and taxes paid and disposable income will decline. These submissions also attribute much of the reduction in local logging and milling activity to high stumpage rates and ask how a constraint imposed by government is handled.

Two submissions say it is not logical to consider the timber requirements of proposed processing facilities when the effects of land claims and forest management objectives not yet implemented are excluded from consideration. They say it's unacceptable that facilities should be proposed, let alone given consideration, until the AAC has been determined and it is shown that existing facilities are inadequate.

Timber Supply Area Analysis Report

Land Base Factors

PIR asks why all heli-sawlog types are removed from the timber harvesting land base when PIR and the Small Business program have heli-logged many areas over the past five years.

Regeneration Factors

With regard to the statement that marginal stands are planted to spruce and pine after harvesting, PIR says their planting program has averaged more than 15 percent subalpine fir for the past five years, supplemented by the retention of pole- and sapling-size balsam stems, particularly at higher elevations.

Non-Timber Values

On the topic of green-up requirements, PIR says it is their understanding that patch size distribution and seral stage objectives and strategies will provide management direction in each landscape unit. Therefore, the company says, green-up will be considered during patch size interpretations but will not impact timber supply on their own.

PIR says the information on visual quality objectives (VQOs) needs to be updated now that landscape unit plans have been approved for all units (except the valley). The company says it is their understanding that the reductions for partial retention and retention VQO constraints are lower in approved landscape unit plans than those presented in the *Analysis Report*.

An individual submission questions how regenerating marginal sawlog/pulplog stands to spruce or pine achieves the objective of landscape unit plans to maintain a diversity of coniferous and deciduous species that represent the natural species composition of each biogeoclimatic subzone.

Unsalvaged Losses

PIR says the spruce bark beetle was not mentioned and the estimated loss due to tomentosus root rot is high, and suggests a combined annual loss for the two may be about 20,550 cubic metres per year.

Socio-Economic Factors

The Village of Telkwa expresses concern about timber being transported out of the region for processing. They say it's crucial that timber harvested locally be processed locally so

communities can reap the employment benefits.

The Town of Smithers expresses support for the Bulkley LRMP and its principles, but are concerned about potential job loss and the effect it could have on local communities.

Other Comments

Several submissions comment on factors or issues other than those specifically covered by Timber Supply Review documents. These comments are summarized in this section.

Timber Supply Review Process

Two submissions say the statement that the AAC determination is an independent, professional judgement is questionable. They say the determination has all the appearances of being purely political, with information being considered only if it supports the current political agenda. These submissions say many non-timber values are not mentioned or considered in the analysis (e.g., living forests as carbon sinks and run-off moderators; berries, mushrooms, and edible and medicinal plants).

Two submissions say the outdoor activities described in the *Information Report* show a bias towards higher cost, wilderness-oriented activities. They say too much focus has been on benefits to a relatively small part of the population and note that most recreational activities are accessible due to logging infrastructure (such as roads) which, they say, contradicts the assertion that industrial activities and recreation are mutually exclusive.

Harvest Levels

The Village of Telkwa and the Town of Smithers express their support for the forecasted AAC. The Town of Smithers also expresses support for diligent planning and activities that maintain or increase harvest levels in the future.

Appendix 1

Submissions received by the Bulkley Forest District

Submissions received on the Data Package

Forest industry

Skeena Cellulose Inc./Repap
Pacific Inland Resources

Government agencies

Ministry of Environment, Lands & Parks (2)

Interest groups

Bulkley Backpackers

General public

One individual submission

Submissions received on the Timber Supply Analysis Report

Forest industry

Pacific Inland Resources

Local government

Village of Telkwa
Town of Smithers

General public

One individual submission